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January 17, 2023

By ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Alkeia Barnes*, 22 Cr. 307 (JGK)

Dear Judge Koeltl:

*Application to waive
personal appearance granted.
So ordered
for G. Koeltl
U.S.D.S.
1/17/23*

I write to respectfully request that the Court waive Ms. Barnes' appearance at today's conference, in which I expect only procedural matters – specifically, setting a motion schedule – to be discussed.

Ms. Barnes is now working two jobs, and it will be extraordinarily difficult for her to appear this morning given her schedule. (The lateness of the request is solely my fault, as I neglected to ascertain Ms. Barnes availability in a timely manner.)

In the alternative, I respectfully request that the Court adjourn the conference and reschedule it for either a Monday afternoon or Wednesday morning, which will accommodate Ms. Barnes' schedule. If the Court reschedules the conference, I consent on Ms. Barnes's behalf to the exclusion of time under the Speedy Trial Act.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ _____
Martin Cohen
Assistant Federal Defender
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